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Sebeya Landscape Restoration Rwanda – Sustainability Advice

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Advisory Report by the NCEA

Title	**Sebeya Landscape Restoration Rwanda – Sustainability Advice**
To	Embassy of the Kingdom of the Netherlands in Kigali, Rwanda
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CC	Mr M. (Martin) Koper, Head of Cooperation
Request by	Ms K. (Karen) Arnon of Dutch Ministry of Foreign Affairs
Date	22 October 2018
From	the Netherlands Commission for Environmental Assessment
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1.   Introduction

The NCEA/Sustainability Advice received a request from the Netherlands Embassy in Kigali dated 15 October 2018 to assess a proposal for the Sebeya Landscape Restoration programme in Rwanda. The proposal (version 1-9-2018) will be discussed in a meeting of representatives of the Embassy, IGG and NWP during a Q@E telephone conference on the 23rd of October 2018. The NCEA is asked to contribute to this meeting and assess the proposed programme, with specific attention to environmental, socio-economic and institutional sustainability.

This advisory report contains the sustainability assessment of Sebeya Landscape Restoration Programme. It has been prepared with inputs from experts on environmental, socio-economic and institutional sustainability (see colophon).

Assessment framework

The proposal is assessed against the DSU[1] Assessment framework for Sustainability Analysis that has been developed specifically for Dutch water and food security programmes. It looks at governance, people, planet and profit along seven dimensions, for each of which sustainability issues (up to 37 in total) have been defined.

Dimensions of sustainable development
1. Political economy
2. Policy culture & Representation
3. Rule of Law
4. Organisational dimensions
5. Economic
6. Social
7. Environment and climate

For a full checklist, see annex 1. For each of the issues the following four questions have been answered:
1. Is the issue relevant for the proposed programme?
2. Does the proposal take this issue into account?
3. Are there opportunities to contribute to (or to strengthen) the integration of this issue in the proposal?

2.   Project Brief and expected results

General background

Title: Sebeya Landscape Restoration Pilot Programme
Organisations: to be tendered
Period: May 2019 – June 2022
Documents:
- Programme document (September 1st, 2018)
- Notes on the Technical Assistance component by Timmo Gaasbeek (October 15th, 2018)

The Sebeya Landscape Restoration Pilot Programme will build on the current Dutch-funded Water for Growth Rwanda programme. The project is foreseen to have two components: 15 million Euro as a contribution to the IWRM Investment Fund (IIF), specifically for landscape

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[1] Dutch Sustainability Unit, the predecessor of the current NCEA/Sustainability Advice programme

restoration interventions in the Sebeya catchment area, and 7 million Euro for Technical Assistance.

The programme intends to have four outcomes:
- Reduced land degradation, river sedimentation and flooding
- Improved incomes and resilience from sustainable use of landscape resources
- Operational landscape governance and management institution
- Evidence-based guidelines on the landscape approach

The Technical Assistance is proposed to have the following components:
- Enhancement of institutional framework
- Capacity strengthening of staff in key national and local institutions
- Demonstration of added value of IWRM & Landscape Restoration in pilot catchments
- IIF management
- Knowledge management

3. Conclusions on environmental, socio-economic and institutional sustainability

The proposal " Sebeya Landscape Restoration" (September 2018) provides a relevant basis for interventions through contextual analysis and generic embedding of sustainability principals. It provides a logical and necessary implementation mechanism to elements of the Sebeya catchment plan and early implementation projects initiated by the Water for Growth programme. In terms of environmental, socio-economic and institutional sustainability however, several aspects of the proposal can be strengthened. In table 1 the dimensions of sustainable development are presented and scored.

Overall observation on social-economic and institutional sustainability
The proposal is quite technical and describes all components of the programme in a systematic and structured way. Less attention is provided to the social issues that prevail in the region, including poverty, food insecurity, gender disparities and vulnerable groups. The proposal states that community participation is at the heart of its approach but does not provide any details on the characteristics of this community and how to make sure benefits are equally shared among different population groups and gender equality is promoted.

On governance: Even though the catchment boundaries do not fit administrative boundaries the programme can build on the overall Sebeya catchment planning process, which has already put effort in creating an institutional environment that fits the administrative arrangements (e.g. ministries and districts). Efforts to collaborate with other ongoing programmes are positive. Human resources put much emphasis on expatriate expertise and little on presence in the catchment; this seems somewhat unbalanced. Institutional learning is an important issue in the proposal, but its elaboration needs strengthening.

Overall observation on environmental sustainability and climate change
From an environmental sustainability perspective, the programme addresses relevant issues. Landscape restoration and adding value on land use are a necessity to create a catchment

capable of sustaining a growing population. It remains unclear however what the various proposed approaches look like (sustainable mining models, payment for ecosystem services, public private partnerships) and how they will be implemented.

From a climate change perspective, the proposal aims to stimulate "climate-smart agriculture" and "climate-resilient development". Again, it remains unclear what exactly this implies for the practical reality of project implementation. There is no information on expected climate change impacts in the catchment on or by the programme.

Table 1: Sustainability assessment – scores on dimensions of sustainable development

Dimensions of sustainable development	Relevant to this proposal?	Covered in this proposal?	Opportunities for (strengthening of the) integration in the proposal?
1. Political economy	+	+/−	+
2. Policy culture & Representation	+	+/−	+
3. Rule of Law	+	+/−	+
4. Organisational dimensions	+	−	+
5. Economic	+	+/−	+
6. Social	+	−	+
7. Environment and climate	+	+/−	+

Overall Conclusion
The proposal does not yet present a fully elaborated programme in terms of concrete interventions and mechanisms of implementing and tracking progress of the interventions. The proposal contains a lot of generic language and uses most of the relevant buzz-words (resilience, public-private partnerships, community based organisations, payment of ecosystem services, innovative financing, etc. etc.), but does not give sufficient substance to these concepts. This renders appraisal of the document difficult, even for someone with some knowledge of the catchment.

Especially social aspects will need to be elaborated further, as well as organisational aspects. Environmental sustainability and climate change can be strengthened. The proposal seems stronger in terms of political economy and contextual analysis.

The full assessment is presented in annex 2, with scores on different criteria for the above presented dimensions of sustainable development. Where relevant, this assessment includes concrete recommendations on each criterion.

Annex 1: DSU Assessment framework for Sustainability Analysis – checklist – *version March 2016*

1. Political economy		GOVERNANCE
1. Political framing and relevance of theme – *How important is sustainable development in the political agenda / arena?*		
2. Natural resources management (NRM) arrangements and responsibilities, including land-use planning – *What is the quality and implementation of arrangements of land use planning and NRM?*		
3. Environmental economic and commercial costs & benefits – *Are costs of unsustainable development known and taken into consideration?*		
2. Policy culture & Representation		
4. Primary processes implementer – *Are sustainable development considerations part of the core processes of the implementer?*		
5. Representation in decision-making – *Are stakeholders part of planning and decision-making*		
6. Accountability and transparency – *As to sustainable development*		
7. Business interests (NL and locally) – *Are consequences and opportunities of sustainable development of the private sector known and included?*		
3. Rule of Law		
8. Law enforcement and corruption		
9. Contract security		
4. Organisational dimensions – see Appendix to this table (below)		
5. Economic		PROFIT
10. Economic rationale national budgets – *Are the consequences of (un)sustainable development for national budgets known?*		
11. Raw materials (continuity of supply, efficient use and production, energy supply)		
12. Business development services including appropriate technological innovation (RD&D)		
13. Sustainable trade		
6. Social		PEOPLE
14. Demographic trends		
15. Employment, wages and decent work		
16. Land rights and security of tenure		
17. Households vulnerability (including income, food security and health)		
18. Mechanisms for equitable benefit sharing, taxes, fiscal system		
19. Gender		
20. Cultural aspects		
7. Environment and climate		PLANET
21. Climate change		
22. Vulnerable and protected areas		
23. Land and soil resources		
24. Water resources		
25. Ecosystem services		
26. Forestry resources		
27. Energy resources		
28. Environmental health		

4. Organizational dimensions	GOVERNANCE
29. Mandate and vision	
30. Structure and management practices	
31. Human resources	
32. Financial resources	
33. Service delivery	
34. External relations and advocacy	
35. Participation	
36. Institutional monitoring	
37. Institutional learning	

Annex 2: Sebeya Landscape Restoration – Sustainability Assessment

Legend:

a. Relevance: + = relevant, – = not relevant

b. Coverage: + = covered, – = not covered

c. Opportunities: + opp have been identified , – = opp are not relevant

Governance		Score			Explanation of the assessment/observation/remarks/suggestions
1. Political economy					
Key sustainability issues	*Assessment criteria*	*Score*			
	Focus on programmes and projects	*relevance*	*coverage*	*Opport.*	
1. Political framing and relevance of theme • *How important is sustainable development in the political agenda / arena?*	• Attention given to the political and societal debate about S-E-CC issues associated with the sector	+	+	+	• The programme is in line with the National Strategy for Transformation (NST-1 2017-2014) and Rwanda's Green Growth and Climate Resilience National Strategy for Climate Change and low Carbon Development (GGCR). These strategies aim to realize sustainable land and water resource management. • The proposal is also in line with the Water for Growth Programme from the EKN in Rwanda, focussing on local level catchment management and landscape restoration • Well elaborated introduction explaining the constraints that limited natural resources set to social and economic development In Rwanda. At policy level convincing efforts are made to facilitate economic transformation, social transformation, and

					transformational governance within a framework of green growth and climate resilience. *Recommendation: it is not clear to what extent the programme addresses social issues. The social analysis in the context analysis could be strengthened.*
2. Natural resources management (NRM) arrangements and responsibilities, including land-use planning • *What is the quality and implementation of arrangements for land use planning and NRM?*	• Linkages to the governance and management level(s) affecting natural resources in the sector programmes	+	+	+	• This is the core of the programme. This programme aims to introduce NRM from a landscape approach perspective (multi-functional, participatory, local ownership, ecosystem services, etc.). The proposal provides little concrete examples. Centrally organised Rwanda doesn't have a history of bottom up local governance. The recent past has shown that participation and keeping local communities involved was one of the most difficult parts of the catchment planning process. *Recommendation: the proposal gets the benefit of the doubt as the intentions are well elaborated; concrete examples would improve the narrative.*
3. Environmental economic and commercial costs & benefits • *Are costs of unsustainable development known and taken into consideration?*	• Linkages to sustainability priorities based on economic and commercial costs and benefits	+	–	+	• No information is provided on this issue. The question is how population pressure and growth is being accounted for. The problem of overexploitation has been introduced, but there is no further reference to the continued growth of rural population and related pressure on natural resources. There is little concrete evidence of new jobs created; the emphasis is on improved (sustainable and resilient) income generation. On the latter quantified information is lacking (for example from other experiences) so it is difficult to say whether the programme will actually reduce resource depletion.

		Score			
					Recommendation: explain how the programme intends to deal with these issues.
2. Policy culture & Representation					
Key sustainability issues	*Focus on programmes and projects*	*relevance*	*coverage*	*relevance*	
4. Primary processes implementer • *Are sustainable development considerations part of the core processes of the implementer?*	• Attention given to strategic aspects of the lead institution, especially mandate, strategy, capacities, instruments and practices to carry out the proposed programme	+	–	+	• From the project proposal it is not clear enough how the "on the ground" day to day implementation is organized. • Not clear whether sufficient social expertise is embedded in the team/partners. *Recommendation: The project governance is complex and an organigram would clarify on who does what and who is accountable to whom.*
5. Representation in decision-making • *Are stakeholders part of planning and decision-making*	• Attention given to equitable representation in decision-making and programme development	+	+/–	+	• Stakeholder analysis will still be done as part of the first steps of the programme. This analysis is key as part of the participatory approach and to understand certain social dynamics. • The proposed local level approach of the proposal aims to ensure all stakeholders are properly consulted and engaged. Stakeholders are broadly divided into primary, secondary and tertiary stakeholders and for each group their interest and moments for engagement in the project are defined. • The project aims to include community stakeholders in the consultation and decision-making process resulting a community-owned micro catchment action plan (MCAP) and has described the process in detailed activities in table 9.

					• Stakeholders for value chain development and their roles in the programme are not clearly defined, apart from a brief mentioning in table 11. • It is unclear who will select the key community stakeholders and on the basis of what criteria (gender, age, social status). • The possible role of strategic environmental assessment as a process tool to facilitate informed and transparent decision-making is not mentioned. It may also be required by Rwandan law. *Recommendations: include criteria for the selection of key community stakeholders. Define stakeholders for value chain development, and their role in the programme. Explore the role of SEA in this respect.*
6. Accountability and transparency • *As to sustainable development*	• Attention for an effective system whereby those who govern can be held accountable by those affected by NRM policy decisions. • Note: gender sensitive!	+	+/-	+	• The programme stresses that involvement of all administrative levels guarantees accountability of the districts towards local communities (bottom-up accountability) and accountability of the districts towards the President of the Republic (top-down accountability). (p25). The mechanism for being hold accountable (aside from Imihigo) is not clear yet. • Gender disparities are not discussed in the proposal • W4G has obtained experience on the use of SEA as a means to create transparency and accountability. This is not addressed in this proposal while the upcoming law on SEA will most probably require SEA for catchment plans. *Recommendations: include gender-sensitive approaches in the proposal, and re-work the log-frame accordingly, by including gender-sensitive M&E indicators*

7. Business interests (NL and locally) • *Are consequences and opportunities of sustainable development of the private sector known and included?*	• Level by which business interests with respect to S-E-CC issues are taken into account	+	+/-	+	• The programme assumes there is private sector interest but also mentions there is little experience with IWRM-PPPs (table 20). Mapping of potential private sector actors would be useful to understand if there are realistic opportunities. • The programme links with other Dutch funded programs such as the HortInvest. No reference or explanation is provided on how this programme links with business interest. *Recommendations: include mapping of potential private sector actors and their interest in investing through IWRM-PPP. Also include explanation of the business interests and other Dutch funded programmes in Rwanda.*
3. Rule of Law					
		Score	Score	Score	
Key sustainability issues	*Focus on programmes and projects*	*relevance*	*coverage*	*Opport.*	
8. Law enforcement and corruption	• The extent to which measures to enhance law enforcement with respect to relevant S-E-CC issues are taken into account • The extent by which relevant corruption issues are taken into account and adequate measures to counter this are proposed (i.e. practices that are against the law and established rights).	+	+/-	+	• The project aims to work hand in hand with local authorities and governance structures, this encourages law enforcement • An analysis of existing informal rules and laws that influence the project is missing. Informal laws and rules are known to influence for example land ownership that could influence the project. • Rwanda is one of the least corrupt countries in Africa, however there are still cases of corruption. Therefore, it would be recommended to include a paragraph in the proposal on dealing with corruption. E.g. the proposal notes that RWFA's Single Project Implementation Unit (SPIU) is

					responsible for managing this IWRM Investment Fund (IIF), including preparing and managing public procurement of the works. What measures are taken to ensure financially sound management of the public procurement procedure? *Recommendations: strengthen the proposal by including an analysis of existing informal rules and laws. Also address corruption and how to deal with it.*
9. Contract security	• Attention for contract security aspects and the business environment	+	–	+	• No assumptions or risks are identified with regard to actual implementation of the contract for this programme. *Recommendation: assess risks related to the implementation of the contract for this programme.*
4. Organizational dimensions					
Mandate-vision Management HR Financial resources Service delivery External relations Participation Institutional monitoring and learning	• These issues have been grouped together for the purpose of this assessment	+	–	+	Strong points include: • The programme aims to work with several existing initiatives. It intends to work closely with a number of authorities that have formal planning responsibilities. This enhances embedding the micro catchment plans in the existing planning mechanisms (particularly at district level). • The programme also intends to collaborate with other programmes (e.g. on horticulture, on creation of PPPs) thus creating effective interaction and hopefully added value. The support unit (ISU) of the W4G programme will support this new programme. • Learning is very much stimulated through the programme • Programme builds further on the W4G programme, which has invested significant effort in created a clear structure for river catchment planning within the Rwandan institutional setting and legislation. It is

					a logical step bringing the catchment plan into practice, making use of the structure put in place.
					Recommendations: strengthen/include the following elements: • *The organisation of the programme is complex. It remains difficult to understand who has the final management and leadership. An organigram is missing.* • *M&E is indicated as being very important, however the M&E budget in terms of staff is limited* • *Only two additional staff members located in the catchment sounds very minimal, considering the amount of activities within the catchment. More local presence is more convincing.* • *The additional note on TA makes a useful suggestion: "In order to make sure that RWFA really owns the process, the question can be asked if external consultants are the best way of working. This approach is expensive, and it takes a good consultant to ensure that RWFA really takes ownership for whatever is developed."* • *A landscape approach is all about participation. Participation is firmly embedded in the proposal, both participation at field level (creation of CBO's), at institutional level, and at the interface of public and private. Yet, the language of the proposal is very generic, and it does not provide concrete mechanisms and examples of what this will look like in practise (see also 5).* • *Knowledge management is a specifically addressed theme. Especially at local/farm level knowledge is being enhanced. The lessons learned will feed back into the programme. The proposal states that "the*

					programme will document the results of these activities, disseminate and share them through the government departments' websites, other social media, seminars, conferences and other public events." This is too vague and not enough for institutional learning; more clarity is needed on the mechanism how lessons will be embedded in an institutional setting. • *This project will be the last Dutch investment on IWRM and landscape restoration in Rwanda. In terms of long-term sustainability of the intervention, it seems unrealistic that addressing issues related to water allocation, erosion control and flood control will all be sustainably addressed within a few years' time. The additional note on TA rightfully underlines the importance of institutional embeddedness of IWRM and landscape restoration. How this will be done, needs to be elaborated further.*
Profit					
5. Economic					
		Score	*Score*	*Score*	
Key sustainability issues	*Focus on programmes and projects*	*relevance*	*coverage*	*Opport.*	
10. Economic rationale national budgets • *Are the consequences of (un)sustainable development for national budgets known?*	• Attention given to implications for the national economy and budget	?	–	?	• This might be relevant but does not seem to be explicitly taken into account.
11. Raw materials (continuity of supply, efficient use and production, energy supply)	• Extent by which long term availability of raw materials	+	+	+	• Scarcity of fertile land , increased land degradation and exhaustion of natural resources are sufficiently being taken into account. One of the main

	essential for economic growth are taken into account				objectives of the programme is to promote the sustainable use of landscape resources leading to increased incomes and resilience. A specific intended result reads: "Incentive measures for rational use of natural resources designed/implemented". • Activities are designed to increase agricultural productivity through sustainable land and water management that aim to maintain the natural resource base. Measures include anti-erosion interventions, Climate-smart agriculture, Good Agricultural Practices, small scale irrigation and pilots for payment of ecosystem services. *Recommendation: include an analysis on the effects (risks) of increased need of water for irrigation on drinking water (e.g. extra pressure on drinking water)*
12. Business development services including appropriate technological innovation (RD&D)	• Extent by which support is proposed to investments for Business Development Services, appropriate technology and RD&D, involving companies, NGOs and resource users	+	+	–	• Implementation of the MACP includes business development and capacity strengthening components such as Organization of farmers for value chain development and providing Facilities for value chains development • For these components, the pilot will rely on the District & HortInvest programme of EKN. (p28 proposal)
13. Sustainable trade	• Attention given to opportunities for more sustainable trade initiatives (with environment and social criteria)	+	–	+	• No information is available on opportunities for sustainable trade initiatives, other than that the programme aligns with the HortInvest project, 2017-2021, which has a trade component. *Recommendation: include information on sustainable trade opportunities, or guidance on how to identify them*

People			Score	Score	Score	Explanation : What is the current context concerning this criterion
6. Social						
Key sustainability issues	*Focus on programmes and projects*		*relevance*	*coverage*	*Opport.*	
14. Demographic trends	• Extent by which demographic trends are taken into account in the development of the sector programmes		+	–	+	• The programme mentions that "A key issue in Rwanda's economic transformation remains the imbalance between the population and the country's natural resources." However, trends such as population growth or age groups have not been analysed and incorporated in the design of the programme (missing context analysis). • The programme does not differentiate between male and female farmers in its approach nor does it make specific mention of inclusion of youths or vulnerable groups in its activities. *Recommendations: include population growth trends in the programme design and differentiate between developments specific for gender, youth or vulnerable groups in the programme activities*
15. Employment, wages and decent work	• Extent by which aspects of employment, minimum and living wages and decent work conditions are integrated		+	–	+	• In the programme intervention area, households are mainly engaged in unskilled agricultural labour. The CFSA 2015 notes there is a lack of long-term data regarding casual labour wages, but that in 63 percent of districts, the daily wage is below the national average. • Value chain development through PPPs is said to increase the economic value of agricultural produce, and <u>hence</u> the farmers income. The latter conclusion highly depends on the arrangement for sharing of

					benefits. In practice the profits often remain in the chain and often does not reach the farmers. Some more detail on the mechanism and in-built guarantees can make the approach more convincing *Recommendations: The proposal should provide more details on how increased production will lead to increase of hired labour and how the programme promotes fair labour conditions, including wages for both male and female workers and including mechanisms for sharing benefits with farmers.*
16. Land rights and security of tenure	• Extent by which land rights issues are taken into account, with attention for the relationship with environment and climate change issues	+	–	+	• Migration as a result of conflict is still causing disputes between families and government today in many regions. Specific cases of land disputes were reported in the project areas (By Human Right Watch) • See remarks under forest resources (Issue nr 26). In more general terms the proposal supposes that the interests of land users are in line with catchment restoration. What if this is not so; what if different groups have opposing interests, what if communities' priorities are not according to the programme's objectives? *Recommendation: the project should get a clearer sight on land titles and potential disputes in the intervention areas before starting project activities.*
17. Households vulnerability (including income, food security and health)	• Extent by which effects on household vulnerability, incomes, food security and health are taken into account	+	–	+	• One of the main objectives of the programme is to establish Improved incomes from sustainable use of landscape resources. This includes ensuring income generation through agricultural activities by farmer households. • The programme focuses on income (producing for the market) rather than food security. According to the latest "Comprehensive Food Security and

					Vulnerability Analysis and Nutrition Survey" (CFSVA), 2015 report, the lowest percentage of food secure households is found in the Western Province. This is also the province with the highest percentage of severely food insecure households (6%). *Recommendation: an analysis on the impact of increased production for the market in relation to food security is missing and should be included in the proposal.*
18. Mechanisms for equitable benefit sharing, taxes, fiscal system	• Level in which mechanisms for benefit sharing, local taxes and a fiscal system are supported or integrated	+	–	+	• No mention of how beneficiaries will be selected and how benefits will be shared within communities. *Recommendation: include criteria for selection of beneficiaries and benefit sharing*
19. Gender	• Extent to which gender is mainstreamed by concrete actions	+	–	+	• Gender is highly relevant in this programme, but it is not clear what is done to pro-actively include/target women. The agriculture sector in Rwanda is worked mainly by poor women with lowest levels of schooling and highest rates of illiteracy. As a result women remain in the subsistence agriculture, they receive low prices for their products due to lack of market intelligence, they lack capacities to participate in agri-business and are employed in lowly paid positions in secondary agriculture. *Recommendation: render the proposal gender sensitive, by paying attention to gender equality at the level of context analysis, intervention approaches, logframe and M&E indicators.*
20. Cultural aspects	• Value system, standards and habits of different socio-economic groups • Level of cultural heterogeneous	+	–	+	• Not mentioned in the proposal, should be included in the social context analysis *Recommendation: include cultural aspects in the social context analysis*

Planet					Explanation :
7. Environment and climate					
		Score	*Score*	*Score*	
Key sustainability issues	*Focus on programmes and projects*	*relevance*	*coverage*	*Opport.*	
21. Climate change	• Extent by which (contribution to) climate change objectives can be achieved.	+	–	+	• The proposal repeatedly refers to climate resilience and climate-smart agriculture, but doesn't provide any practical examples of what this actually means in the Sebeya context. What does climate-smart agriculture look like; what does it mean in relation to the present and future resource exploitation; how does it affect production levels, jobs, investment costs. • There is little reference on the concrete expected consequences of climate change for the catchment. *Recommendations: describe more explicitly what is meant by climate-smart agriculture in Sebeya, assess concretely what the expected consequences of climate change will be for Sebeya and adjust approaches accordingly. Include climate-smart indicators in the M&E framework as well.*
22. Vulnerable and protected areas	• Extent by which the existing or planned protected areas are affected. Eg. national ecological network of protected areas and corridors is can be supported or affected.	+	–	+	• There is a reference to the Gishwaty forest national park covering 50% of the Sebeya catchment. This formerly forested area has a history of land clearing by refugees during the genocide period with less than 10% of original forest remaining. It is known for its small but growing population of chimpanzees. Reforestation efforts and sustainable cattle ranching have been promoted in recent years (personal observation). No further information is given on what the project contributes to the nature conservation

					and tourism development objectives of the park. This could be a missed opportunity. *Recommendation: clarify whether the project could contribute to the nature conservation and tourism development objectives of the park, justify choices of whether or not to intervene at this level in Sebeya catchment*
23. Land and soil resources	• Extent by which relevant land degradation issues are taken into account as a central theme for S-E-CC.	+	+/-	+	• Vulnerability of the entire catchment to erosion due to unsustainable land use practises is a core issue in the proposal. It is addressed by a participatory landscape approach, making good use of existing experiences elsewhere in the country. Generic language makes it difficult to understand what exactly is proposed: what does climate smart agriculture look like; what does rational use of natural resources look like? *Recommendation: render the proposal more tangible by including examples and specific approaches to climate smart agriculture and rational use of natural resources in relation to erosion prevention.*
24. Water resources	• Extent by which multiple water use is taken into account as a central theme, with attention for how it affects economic production and creates social tensions.	+	+/-	+	• The project builds further on the W4G catchment planning exercise which represents the best available knowledge in Rwanda on water resources management issues. Sebeya has served as a model catchment for which the first participatory catchment management plan with integrated Strategic Environmental Assessment (SEA) has been developed; the team has gone through a steep learning curve. The proposed project will extend the learning curve. • The question is whether the proposed river training and riverbank protection works are 'climate smart'.

					River training usually reduces flood risk at one site, consequently transferring the risk to downstream areas. Probably these measures will be subject to an Environmental Impact Assessment under Rwandan law, this is not mentioned in the proposal • The proposal also does not refer to SEA, strategic environmental assessment. An SEA has been made for the Sebeya catchment plan; further elaboration of sub-catchment plans can benefit from an associated and integrated SEA process aimed at maintaining linkages between the different decision making levels, from national to district level, and aimed at looking at potential cumulative impacts of various sub- and micro-catchment plans. Such SEA does not have to be heavy; it moreover is a security check between local and wider basin issues and a guarantee of transparent planning. *Recommendations: elaborate how the proposed river training and riverbank protection works will be climate smart and avoid transferring risk to downstream areas. Refer to SEA and EIA as tools to integrate environmental and social issues in decision making at planning and project levels, respectively*
25. Ecosystem services	• Extent by which effective spatial (land use) planning with ecosystem services is integrated	+	+/−	+	• Ecosystem services are well-integrated into the approach. The intention is to implement payment for ecosystem services (PES) scheme. However, the proposal only produces generic language on the proposed PES schemes and does not give any practical evidence what it is about, how it could work, who provides the services, who pays for it, who will organise and monitor it, etc. The proposal refers to experiences in the region, but examples are

					not provided. Examples could demonstrate how PES works to create a market incentive for upstream people to protect for example forested upland as a means to control erosion, avoid landslides and downstream floods, and guarantee a more constant river flow. *Recommendations: elaborate on how PES could work in Sebeya specifically. Provide examples of successes elsewhere and how this could be transferred to Rwanda, and Sebeya specifically.*
26. Forestry resources	• Extent by which sustainable forest management and management of carbon stocks is integrated in programme	+	+/-	+	• Deforestation is a serious problem in the mountainous Sebeya catchment with steep and easily erodible slopes. The presented plans for reforestation of the steepest parts of the catchment are extremely relevant. • What is not addressed however is how lands that are presently used for agriculture can be reforested without social problems. No information seems provided on land tenure rights and what will be done with the farmers that will have to give up their lands to reforestation. *Recommendations: demonstrate how the programme will deal with land tenure and the socio-economic consequences of changes in land use due to programme interventions*
27. Energy resources	• Extent by which opportunities for a shift towards more renewable sources of energy is integrated Note: gender sensitive!	+	+	–	• Sebeya catchment has one (or more?) mini hydropower station which suffers from high sediment load in the river; the sediment problem is being addressed by the project. • The proposal indicates that other opportunities for mini hydropower are being investigated. These are run-of-the-river systems producing clean energy

					with virtually no impact on the river hydrology; worth investigating. • Several actions aim at reduced use of fuelwood and charcoal; no information on gender (as is the case throughout, see recommendations above).
28. Environmental health	• Extent by which the causes for environment related health causes are influenced.	?	?	?	• Health has not been addressed in the proposal. Not clear whether this is an issue. • Water pollution is described in terms of sediment loads; there is little information on potential health issues. The Sebeya river is a fast-flowing river where breeding of schistosomiasis and malaria vectors will not be an issue. • From a public health perspective, the announced promotion of rainwater harvesting facilities for public water supply is extremely relevant.